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Attorneys for Plaintiff
HELEN A. MANNEH

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

HELEN A. MANNEH)	Case No.: 2:15-cv-02200-RFB-PAL
)	
Plaintiff,)	UNOPPOSED MOTION TO EXTEND
v.)	TIME TO FILE MOTION FOR
)	REMAND AND/OR REVERSAL
CAROLYN W. COLVIN, Acting)	
Commissioner of Social Security.)	(FIRST REQUEST)
)	
Defendant.)	
)	

Plaintiff Helen A. Manneh and Defendant Carolyn W. Colvin, Acting Commissioner of Social Security, through their undersigned attorneys, stipulate, subject to this court's approval, to extend the time by 36 days from June 22, 2016 to July 28, 2016 for Plaintiff to file her Motion for Remand and/or Reversal, with all other dates in the Court's Order Concerning Review Of Social Security Cases extended accordingly. This is Plaintiff's first request for an extension.

1 An extension of time for plaintiff is needed due to a serious illness. The
2 spouse of the associate in Counsel's firm who this matter is assigned to receives
3 treatment for her Stage IV breast cancer which metastasized initially to her liver and
4 has now spread to her lungs, spine, and brain. Counsel requires the additional time
5 to file the Motion for Remand to allow the assigned attorney the appropriate time to
6 assist his Spouse and his two elementary aged children through this obviously
7 stressful experience.

8 Counsel for defendant has indicated, via e-mail, that this motion to extend
9 the time to file is not opposed.

10 DATE: June 27, 2016

Respectfully submitted,

11 ROHLFING & KALAGIAN, LLP

12 /s/ *Marc V. Kalagian*

13 BY: _____

Marc V. Kalagian

14 Attorney for plaintiff Ms. Helen A. Manneh

15
16 DATE: June 27, 2016

DANIEL G. BOGDEN

United States Attorney

17
18 /s/ *April A. Alongi*

19 BY: _____


April A. Alongi

Assistant United States Attorney

20 Attorneys for defendant Carolyn W. Colvin

21 [*authorized by e-mail]

22
23 IT IS SO ORDERED:



24 UNITED STATES MAGISTRATE JUDGE

25 DATED:

June 29, 2016